

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	OMB Control Number:
Paperwork Reduction Act Review for	)	3060-0809
Communications Assistance for Law	)	
Enforcement Act and Broadband Access	)	ref: Docket ET 04-295
Services	)	

**Comments of VeriSign, Inc.**

**Notice of Public Information Collection(s) Review**

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1. For more than a decade, VeriSign has provided an array of large-scale, ultra-high availability, trusted infrastructures that enable signalling, security, identity management, directory, financial transaction, and fraud management capabilities for a broad array of network based business and consumer services – whether it be Internet, Web, Internet access, traditional voice telephony, VoIP, multimedia, next generation, or sales. VeriSign operates through various divisions that have offices and staff in the U.S. and worldwide. In these various capacities, it participates in scores of different forums, working collaboratively with both industry and government to find entrepreneurial oriented solutions.

2. As part of these commercial infrastructure support services, VeriSign provides as a Trusted Third Party both lawfully authorized electronic surveillance (lawful interception) capability requirements to communication providers globally, and other lawful access services (i.e., subpoena processing) known collectively as NetDiscovery Service™. As a result, VeriSign is a significant interested party that will on behalf of its provider NetDiscovery Service customers, make significant use of the systems created in the instant *Notice of Public Information Collection(s) Review*.<sup>1</sup>

## A. Applicable Paperwork Systems

3. VeriSign understands in accordance with the Federal Register notice that five systems are being created:

- (1) **System Security Statements.** Within 90 days of the effective date of the Second Report and Order, facilities based broadband Internet access and interconnected Voice over Interconnected Protocol (VOIP providers newly identified in the First Report and Order in this proceeding will be required to file system security statements under the Commission's rules. (Security systems are currently approved under the existing OMB 3060– 0809 information collection)
- (2) **Extensions.** Petitions filed under Section 107(c), request for additional time to comply with CALEA, these provisions apply to all carriers subject to CALEA and are voluntary filings.
- (3) **Reimbursement.** Section 109(b), request for reimbursement of CALEA, would modified, these provisions apply to all carriers subject to CALEA and are voluntary filings.

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<sup>1</sup> 71 Fed. Reg. 43480 (No. 147, 1 August 2006).

- (4) **Extension Supplement.** A new collection would require each carrier that has a CALEA section 107(c) extension petition currently on file to submit to the Commission a letter documenting that the carrier's equipment, facility or service qualifies for section 107(c) relief under the October 25, 1998, cutoff for such relief.
- (5) **Monitoring Reports.** A new collection would require all carriers providing facilities based broadband Internet access or interconnected VOIP services to file monitoring reports with the Commission to ensure timely CALEA compliance

## **B. CALEA implementation makes these paperwork systems essential and steps can be taken to minimize the burden**

4. VeriSign regards the proposed collection of information as necessary for the proper performance of the functions of the Commission, and that the information has significant practical utility. Indeed, it is not apparent how the FCC could implement its explicit CALEA responsibilities imposed by Congress except through the implementation of these systems. For these reasons, VeriSign urges rapid approval and implementation of these systems.

5. The Commission's estimates for the type and number of respondents, the estimated time per response, the frequency of response, the total annual burdens and costs, and the privacy impact seem on their face accurate and comport with VeriSign's own analysis and estimates. Furthermore, VeriSign believes that through the widespread use of Trusted Third Parties such as itself, as well as contemporary and readily available information technologies and expedited processes, that this burden could be significantly reduced.

6. It is important that the Commission take reasonable steps to enhance the quality, utility, and clarity of the information collected. VeriSign believes this could be best achieved by the use of readily available web-based portals that authenticate the submitting party – ideally using public key digital certificate technology coupled with well defined XML-based schemas that capture the information in a standard structured form from users. Provision should be made to submit this information either individually for each provider, or in bulk – including submission by trusted third parties such as

VeriSign. In this context, provision should be made for registration of trusted third parties in such a fashion as to expedite their submissions on behalf of customer providers.

7. Taking the above steps will significantly minimize the burden of the collection of information on the respondents through the use of automated collection techniques and other forms of information technology. It appears based on the appendices of the Commission's 2<sup>nd</sup> Order that the Commission has already taken such steps with respect to the Monitoring Reports system. VeriSign strongly urges that all information for all systems be collected and managed using trusted web portal and bulk upload systems. If the Commission cannot use an existing system for these purposes that it has already deployed, consideration should be given to outsourcing to one of the many vendors who support such systems such as VeriSign.

8. In addition, VeriSign urges that the extensive existing work and coordination within the industry to develop a trusted globally unique "Standard Provider Identifier for IP Related Services (Provider ID Code)" be used to identify the parties filing via the information systems being considered in this proceeding.<sup>2</sup> Ideally, the Provider ID Code could constitute the primary filing identifier. Alternatively, the Provider ID Code should be captured as an additional mandatory identifier that is "bound" to the FCC's CALEA filing system identifiers for broadband Internet access and interconnected VoIP providers.

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<sup>2</sup> See ATIS, *Standard Provider IDs for IP Related Services*, Issue 3073. The use of a standard provider ID is important for many significant industry operations and maintenance, network security, billing and accounting, and intellectual property rights management purposes, and has been coordinated among related committees in ATIS (TMOC, OBF, IIF), IPDR, ITU-T (SG-4), NECA, and IETF. In the ITU-T, this work derives from the global use of ICC identifiers specified in Rec. M.1400.